

August 13, 2014

Laura M. Fant
Attorney at Law
d 212.969.3631
f 212.969.2900
lfant@proskauer.com
www.proskauer.com

Hon. John G. Koeltl
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

**Re: *Hirsch v. Ralph Lauren Corporation, et al.*, 14-CV-5098 (JGK),
Request for Extension of Time to Answer**

Dear Judge Koeltl:

We are counsel for Defendant 99 University Corporation ("99 University Corp.") in the above-captioned matter. We write jointly with Plaintiff's counsel, and pursuant to Your Honor's Individual Practices, to respectfully request that the Court extend the deadline to file 99 University Corp.'s Answer to Plaintiffs' Complaint from August 13, 2014 to September 22, 2014. Plaintiff's counsel has consented to such an extension of time, which would align 99 University Corp.'s time to respond with the time for Defendant Ralph Lauren Corporation to file its Answer, which was extended to September 22, 2014 pursuant to a waiver of service agreement entered into with Plaintiff on July 23, 2014. In addition, the parties have expressed a mutual desire to engage in settlement negotiations and require additional time to do so.

As such, Plaintiff and Defendant 99 University Corp. jointly and respectfully request that the Court grant Defendant's request to extend the deadline to file 99 University Corp.'s Answer to Plaintiffs' Complaint to September 22, 2014. No other extensions of time have been previously requested or obtained in this matter.

We thank the Court for its consideration of this request.

Respectfully submitted,



Laura M. Fant

cc: B. Bradley Weitz, Esq. (counsel for Plaintiff Zoltan Hirsch) (via electronic mail)
Joshua A. Stein, Esq.